REMARKS

Claims 19-25 are pending in this application. Currently no claims stand allowed. The final Office action rejects claims 19-25 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,360,265 to Falck et al. (*Falck*).

The pending claims were added in applicants' Amendment A, submitted in response to the previous Office action. As applicants explained in that response:

> Claims 19-25 are aimed at more distinctly pointing out that applicants' invention relates to a proxy firewall device performing network address translation (NAT) and application-level filtering functions. In the prior art, these functions are handled by separate elements of an internal computer network. Claims 19-25 further emphasize that the filtering of packets is accomplished in a manner that is transparent to the client in the internal network.

Amendment A, p. 7. In short, "claims 19-25 . . . describe a combination of NAT and application-level gateway functions in one network firewall device." *Id.* at 8.

Applicants note at the outset that *Falck* is not 102(b) prior art with respect to the present invention. The filing date of *Falck* is July 8, 1998, and *Falck* issued on March 19, 2002. Therefore, *Falck* operates as 102(b) prior art only as of the grant date, March 19, 2002. The present application was filed on March 31, 2000.

Moreover, *Falck* does not anticipate applicants' claims. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP § 2131 (quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). There are at least two aspects of applicants' claims that *Falck* fails to teach. First, *Falck* does not teach performing network address translation *and* packet stream filtering at the same proxy server (independent claim 19) or proxy device (independent claims 22 and 24). Second, nothing in *Falck* teaches or

2

discloses the performing of proxy server filtering of a stream of packets "such that the filtering is transparent to the client," an element of each of applicants' independent claims. As explained in applicants' specification, proxy servers in the prior art have performed filtering in a *nontransparent* manner (requiring, for example, a component installed on the client that is tied to a specific proxy server). Applicants' invention enables this filtering to be accomplished transparently.

There is some inconsistency in the use of the term "proxy" in the computer networking arts. Applicants' specification makes clear that a "proxy server" is defined to be synonymous to an application-level gateway and is, of course, distinct from network address translation. See Specification, pp. 1-2. *Falck* uses the term "proxy" more loosely, so that a NAT device is regarded as an "address proxy." However, it is clear that *Falck* distinguishes an "address proxy" from the H.323 multimedia proxy. Similarly, the term "filtering" as used in applicants' claims is a precise one which does not encompass mere address translation. In applicants' specification, "address translation . . . performed at a packet level" is contrasted with "filtering . . . performed at a stream level." Specification, p. 18.

Using the terminology of *Falck*, applicants' invention is directed to incorporating the advantages of an address proxy and an application-level gateway proxy within a single proxy server device, in such a manner that the packet stream filtering is performed transparently to the client. *Falck*, by contrast, teaches the use of a NAT intermediate device *in place of* an H.323 multimedia proxy device, rather than combining their advantageous features. See *Falck* at col. 2, ll. 61-63, and col. 3, ll. 19-21.
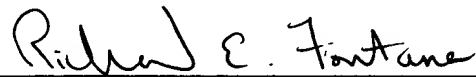
For the foregoing reasons, applicants respectfully request that the rejections of claims 19-25 be withdrawn.

CONCLUSION

The application is considered to be in good and proper form for allowance, and the

Examiner is respectfully requested to pass this application to issue.

If, in the opinion of the Examiner, a telephone conference would expedite the prosecution

of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

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